

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	Chapter 11
SORRENTO THERAPEUTICS, INC., <i>et al.</i> ¹	Case No. 23-90085 (DRJ)
Debtors.	(Jointly Administered)
OFFICIAL COMMITTEE OF EQUITY SECURITIES HOLDERS,	
Plaintiff,	Adversary Proceeding No. 23-03106
v.	
BANK OF AMERICA SECURITIES, INC., MERRILL, LYNCH, PIERCE FENNER & SMITH INCORPORATED, J.P. MORGAN SECURITIES LLC, MORGAN STANLEY & CO., LLC, PERSHING LLC, NATIONAL FINANCIAL SERVICES LLC, STATE STREET BANK AND TRUST COMPANY AND UBS SECURITIES LLC,	
Defendants.	

**BOFA SECURITIES, INC.’S NOTICE OF COMPLIANCE
AND RESERVATION OF RIGHTS**

Pursuant to this Court’s June 14, 2023 Order in the above-captioned adversary proceeding [Adv. Dkt. No. 7] (the “Order”), BofA Securities, Inc. (“BofAS”) hereby files the declaration of Mark S. Winarsky attached as **Exhibit A**.² By complying with this Court’s Order, BofAS does not waive any applicable privileges, immunities, or defenses, including defenses to this Court’s

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity’s federal tax identification number, are: Sorrento Therapeutics, Inc. (4842) and Scintilla Pharmaceuticals, Inc. (7956). The Debtors’ service address is: 4955 Directors Place, San Diego, CA 92121.

² All capitalized terms not herein defined shall have the meanings ascribed to such terms in the *Emergency Application for Temporary Restraining Order and Preliminary Injunctive Relief* filed by the Official Committee of Equity Security Holders [Adv. Dkt. No. 3] (the “Motion”).

jurisdiction, or its right to dispute the legal and factual claims asserted by the Equity Committee. For the avoidance of doubt, BofAS does not consent to the entry of final orders by this Court and reserves all of its rights in that regard, including its right to a jury. BofAS further reserves the right to amend this notice and the declaration attached hereto as necessary to preserve its rights, to seek any and all relief to which it is entitled, and to object to any further relief sought the Equity Committee.

DATED: June 22, 2023.

Respectfully submitted,

MCGUIREWOODS LLP

/s/ Demetra Liggins

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COUNSEL FOR

BOFAS SECURITIES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2023, a true and correct copy of the foregoing has been served on all parties entitled to service via this Court's electronic filing system ("ECF").

/s/ Demetra Liggins

Demetra Liggins